

# **EXHIBIT 1**

1                   being poured?

2         A. Yes.

3         Q. Okay. And you don't know who was pouring it?

4         A. No. But I'm at the point where I knew things  
5                   were getting serious, because the water didn't  
6                   stop and I couldn't breathe.

7         Q. Okay. At that point, either right before the  
8                   water started or right during when the water  
9                   started, did you know who was in the room?

10        A. Right after the water stopped I got my first  
11                   look around the room, and I recognized Thomas  
12                   and Harte.

13        Q. You're referring to Officer Charles Thomas?

14        A. Yep, Chuck Thomas.

15        Q. And Sergeant Harte?

16        A. Yep. He was standing there with -- with a cam  
17                   recorder, recording the whole thing.

18        Q. Okay. Well, I'll get to that in a minute.  
19                   But at that point, when you got your bearings  
20                   and you were able to look around the room, you  
21                   were able to identify Charles Thomas by  
22                   vision, by seeing him?

23        A. Yeah.

1 Q. And you knew who he was, right away?

2 A. Yes.

3 Q. Okay. And is that because you've had previous  
4 time with him?

5 A. Yes.

6 Q. How about Sergeant Harte, you knew exactly who  
7 he was when you saw him?

8 A. Yes.

9 Q. Is that because you had previous time with  
10 him?

11 A. Encounters, yes.

12 Q. So you have Sergeant Harte in the room,  
13 Charles Thomas in the room. You later found  
14 out Troy Mitchell was in the room. Who else  
15 was in the room at that point when you came to  
16 and you were able to get your bearings?

17 A. The two guys that escorted me, they were in  
18 there. And then there was this other guy --  
19 there was another CO there that I didn't  
20 recognize.

21 Q. So three other individuals?

22 A. The CERT Team was there, but I don't know who  
23 those guys are. And some of them didn't have

1                   anything to do with it. Like, they weren't  
2                   near me.

3   Q. Okay. So you've identified Charles Thomas,  
4                   Sergeant Harte and then later found out Troy  
5                   Mitchell. Of these -- it sounded like you  
6                   said three other officers, is that about  
7                   right, were in the room?

8   A. Three, four, yeah.

9   Q. Okay. Do you know who they were, as you sit  
10                  here today?

11   A. I know the escorting officers were there and  
12                  the CERT guys.

13   Q. What are their names?

14   A. I can't tell you their names. I had never had  
15                  an encounter with CERT before.

16   Q. So was it two individuals from CERT?

17   A. I don't know.

18   Q. You never saw them before that day?

19   A. Correct. I can't tell you who's on the CERT  
20                  Team and who's not on the CERT Team. I'm not  
21                  in the Department of Corrections.

22   Q. But when you saw those one or two individuals  
23                  from CERT in the room, at that time, you

1           didn't know who they were, correct?

2 A. That is correct.

3 Q. And the escort officers, who were they by  
4 name?

5 A. Giancola, Phillips, Thomas, Harte, Mitchell.

6 Q. Now, you mentioned Giancola. Did you  
7 recognize him by face when you saw him in the  
8 room?

9 A. I did. I didn't know his name until later on,  
10 though.

11 Q. So you knew you were familiar with that  
12 Officer?

13 A. Not familiar. I wasn't familiar with him. I  
14 just knew his face, because he was one of the  
15 guys that slammed me on -- or that tried to  
16 slam me on the bed in the hospital at Auburn  
17 and decided to pull the pin.

18 Q. And how did you learn of his name later on?

19 A. Because I called the witness to my hearing.  
20 They showed up. I had their names on my  
21 ticket.

22 Q. Okay. And you said also Officer Phillips was  
23 in the room, correct?

1 A. That's correct.

2 Q. And did you know Officer Phillips by face?  
3 Did you know him already?

4 A. Same situation.

5 Q. Okay. You learned of his name later?

6 A. That's correct. On my incident report, my  
7 ticket, and then I got to put it together when  
8 he came to testify at my hearing.

9 Q. Okay. And then there were CERT officers in  
10 the room as well, but you don't know who they  
11 were?

12 A. That's correct. But it was Thomas, Chuck  
13 Thomas, the escorting officers. Troy Mitchell  
14 was the main assailant. Either Giancola or  
15 Phillips is the guys that spread my legs. But  
16 I can't tell you the other names of the  
17 officers in the room.

18 Q. Okay.

19 A. I wasn't -- I was pretty caught up in trying  
20 to close my legs, not write down names.

21 Q. So once the use of water stops, they stopped  
22 putting water on your face, were you able to  
23 pull down your shirt from your face?

1 A. No. He pulled it down.  
2 Q. Who's that?  
3 A. Lieutenant Mitchell.  
4 Q. Okay. And then what happened next?  
5 A. He laughed and started punching me in my face.  
6 Q. Okay. And you're shackled at this point?  
7 A. Always shackled.  
8 Q. Okay. And was anyone holding you up? Well,  
9 let me back up. Were you still on the bed or  
10 were you standing up at this point?  
11 A. I was still on the bed. The whole thing  
12 happened while I was on the bed.  
13 Q. Okay. So you're laying on your back on the  
14 bed, correct? Is that a yes?  
15 A. Yes.  
16 Q. Okay. And you're saying Sergeant --  
17 Lieutenant Mitchell starts punching you in the  
18 face?  
19 A. Yeah. And I was moving, trying to get away  
20 from his punches. He punched me all over the  
21 place, not just the face.  
22 Q. Okay. Where else did he punch you?  
23 A. Punched me everywhere. My upper torso, let's

1 just say.

2 Q. Okay.

3 A. Upper torso to my head. Face, head.

4 Q. And when you say punch, was it a closed fist  
5 or slaps? What was it?

6 A. Closed fist.

7 Q. Okay. And was he using any type of weapon or  
8 was it just his fists?

9 A. As first it was just his fists, until he moved  
10 to my genitals. Grabbed my --

11 Q. Okay.

12 **MS. FREEMAN:** Objection. Pat, please  
13 stop interrupting Mr. Raymond while he's  
14 answering.

15 **BY MR. MACKEY:**

16 Q. Okay.

17 A. Grabbed my genitals. And after he grabbed my  
18 genitals, and didn't get the desired -- I  
19 didn't scream, he started punching my  
20 genitals. And I still didn't scream, but I  
21 was squirming, trying to get my legs closed,  
22 that's when he pulled his baton, started  
23 hitting me with the baton.

1                   And after that, after he hit me with the  
2 baton between my legs, that's when I screamed.  
3 He stopped hitting me between my legs, and  
4 then hit me in the face with the baton.

5 Q. All right. I want to back up, though, to go  
6 over your story. So Troy Mitchell starts by  
7 beating you on -- punching you on the face in  
8 the upper torso, right?

9 A. Yes.

10 Q. Okay. Was anyone else hitting or punching you  
11 or kicking you at that point?

12 A. No.

13 Q. Was anyone else holding you down to help  
14 Mr. Mitchell?

15 A. Not while he was punching me.

16 Q. Okay. So at this point, it's just  
17 Mr. Mitchell that's hitting you?

18 A. Yes, sir.

19 Q. Okay. Now, what happens next? Once he stops  
20 hitting you in the face and the torso, where  
21 does Mr. Mitchell go next?

22 A. He really caught me off guard by grabbing my  
23 genitals, so I didn't think to squeeze my legs

1                   closed. But after the first time he  
2                   grabbed -- tried to grab my genitals, I  
3                   squeezed my legs closed really tight. And  
4                   next thing you know he's, like, hold his  
5                   fucking legs open.

6                   They held my legs open, grabbed me,  
7                   twisted. And then, like, I don't know why I  
8                   didn't scream, but I hadn't screamed yet. He  
9                   stops grabbing me, and then he starts punching  
10                  me in my genitals.

11                  Then it moved to -- while he's grabbing  
12                  me, before he starts punching me, he calls me  
13                  a stupid little bitch. Then he starts  
14                  punching me, and then he grabs his baton.

15                  Three or four times he hit me in my -- between  
16                  my legs. I think it was three.

17                  But that's when I screamed, and that's  
18                  when he sort of hit me with the backhand  
19                  across the face with the baton. And then he  
20                  said, get this bitch -- take this fucking  
21                  bitch to the box.

22                  Q. Let me back up a little bit. When you were  
23                  getting hit in the face, was he hitting you on

1 Q. Okay.

2 A. It was probably his right hand because of the  
3 way the mark -- the mark that it left on my  
4 face. So if he's walking away and smacks me  
5 with the backhand, it left the mark going  
6 diagonal. That's what, I think, closed my  
7 eye.

8 Q. And Lieutenant Mitchell was on your right hip  
9 or right side of your body this whole time?

10 A. Yes.

11 Q. Okay. At any time, did anyone on your left  
12 side of your body hit you?

13 A. No.

14 Q. Okay. At any time, did anyone hit you other  
15 than Lieutenant Mitchell?

16 **MS. FREEMAN:** Objection.

17 **THE WITNESS:** Nobody hit me but  
18 Mitchell.

19 **BY MR. MACKEY:**

20 Q. Okay.

21 A. But the other guys just held my legs open.

22 Q. Now, what comments were made by Lieutenant  
23 Mitchell while this was going on? I know you

1                   mentioned he made the comment about something  
2                   like little bitch, but did he make any other  
3                   type of comments?

4       A. Stupid little bitch. He laughed initially,  
5                   then the stupid little bitch comment, and then  
6                   get -- take this bitch to the box.

7       Q. What's the box?

8       A. SHU, sir.

9       Q. Okay. So was anyone else making any comments  
10                  during the alleged assault by Mr. Mitchell?

11      A. After a while -- I don't -- like I said, I  
12                  can't give you a time that it lasted. To me,  
13                  it lasted forever. Forever. Absolutely  
14                  forever. But at some point Chuck Thomas was  
15                  the one that said that's enough, that's  
16                  enough.

17      Q. Who was he saying that to, Lieutenant  
18                  Mitchell?

19      A. You're going to kill him.

20      Q. Okay. And where was Officer Thomas standing  
21                  when he said that, if you know?

22      A. On the other side of the bed, away from  
23                  Mitchell.

1 Q. Okay. Where -- okay. So you located Officer  
2 Thomas. Where was Sergeant Harte during  
3 Lieutenant Mitchell's alleged attack?

4 A. Sergeant Harte was behind Officer Thomas  
5 during the altercation.

6 Q. How far away were they standing from the bed?

7 A. Thomas was probably two, three feet, tops.  
8 And Harte was eight feet. He was back  
9 farther. Like, he got that whole thing in  
10 frame.

11 Q. Now, you mentioned that you think Sergeant  
12 Harte was videotaping this?

13 A. I don't think, I know. I can state it as a  
14 fact.

15 Q. How do you know that?

16 A. He had the camera and he was going like this,  
17 pointing it at me. And then after it was all  
18 over, they made the comment, get rid of that  
19 fucking chip, the card. Get rid of that  
20 fucking card. And then Mitchell said, you  
21 know what, fuck that, get rid of the whole  
22 camera.

23 Q. When did he start filming or videotaping?

1                   **BY MR. MACKEY:**

2       Q. Mr. Mitchell, we just took -- sorry.

3               Mr. Raymond, we just took a ten minute break  
4               at 4:10, and we're back on at -- at 4:00 we  
5               took a break, and we're back on at 4:11. So  
6               an eleven minute break. I'm just going to  
7               continue asking questions, all right,

8               Mr. Raymond?

9       A. Yes.

10      Q. So at any time that you were in the emergency  
11           room, did you try to do any type of force or  
12           lunge towards any of the officers that were in  
13           the room?

14      A. No.

15      Q. Okay. First thing you remember is you were  
16           lying in the bed?

17      A. Yes.

18      Q. Okay. And when Mr. Mitchell's alleged attack  
19           was over, how did you get out of the bed?

20      A. They pulled me out of the bed and -- yeah,  
21           they pulled me out.

22      Q. Who was they?

23      A. Chuck Thomas was one. And I don't know the

1           other one.

2 Q. Okay. And you said earlier that Officer  
3       Thomas made the comment that Lieutenant  
4       Mitchell needed to stop?

5 A. Yeah.

6 Q. Okay. And what did Lieutenant Mitchell say,  
7       if anything, to Officer Thomas?

8 A. He didn't say anything at all.

9 Q. Did he stop at that point?

10 A. No.

11 Q. Was it your scream that prompted the stop?

12 A. That's what it seemed like. I screamed, and  
13       then the hit to the face and it was -- it was  
14       over.

15 Q. Okay. Then the backhand to the face, that was  
16       the last hit?

17 A. Yes. The backhand with the baton, yes.

18 Q. Okay. The backhand was with the baton?

19 A. Yes.

20 Q. Okay. Were you bleeding at this point?

21 A. Yeah.

22 Q. Whereabouts?

23 A. My face, my ear, my chest. A few minutes

1                   later, during the escort, I started bleeding  
2                   out of my eye.

3   Q. Okay. So who -- you basically were pulled out  
4                   of the bed when you started going out of the  
5                   room?

6   A. Yes. And I told them I just -- they pulled me  
7                   out of the bed after a nurse came in. And she  
8                   said, do you have any injuries to report? I  
9                   looked up at her and I said, please help me.  
10                  She said, what hurts? I said, my penis, my  
11                  neck, my face, my eye is swollen shut. She  
12                  looked at the CO and said, get this piece of  
13                  shit the fuck out of here.

14   Q. What nurse are you referring to?

15   A. Nurse Hoppins.

16   Q. And did you know her already? Is this someone  
17                  you were familiar with?

18   A. No.

19   Q. Okay. This is the first time you ever met  
20                  Nurse Hoppins?

21   A. I believe so. I mean, that was the first  
22                  interaction of memorable -- it was the first  
23                  memorable interaction.

1 Q. How did you later learn that her name was  
2 Nurse Hoppins?

3 A. After I had gotten out of -- like, through the  
4 OSI stuff. You know, mumbling from the  
5 corrections officers, inmates. She was  
6 bragging about it like she had something to do  
7 with it. Like, she was a part of beating  
8 my -- beating me up. And that's basically the  
9 gist of how I found out who it was.

10 And then I identified her, because she's  
11 very -- she doesn't look like anything -- like  
12 any of the other nurses there, so they knew  
13 exactly who I was talking about. And again,  
14 they showed me some pictures. She really  
15 stood out. I knew exactly who she was.

16 Q. And this is OSI that showed you photos?

17 A. Actually, I think, maybe the captain that  
18 interviewed me identified the nurse. I'm not  
19 sure, though, but I don't think it was OSI  
20 that was concerned about the nurse.

21 Q. Was Nurse Hoppins in the room during the  
22 alleged assault?

23 A. No, she was not.

1 Q. Okay. She was called in afterwards?

2 A. She was there initially, and then they told  
3 her to get out.

4 Q. How do you know that?

5 A. Because they told her to get out as he --  
6 like, that last -- that last level, coming  
7 out, I realized Mitchell's got me by my face,  
8 my shirt is upright. And this is before he  
9 starts pouring the water. When I looked over  
10 at her, he was like, you better get out of  
11 here.

12 Q. And he told Nurse Hoppins to get out?

13 A. She left. She did leave, yeah. And then the  
14 next thing I know, I saw her and -- yeah. Get  
15 this piece of shit the fuck out of here.

16 Q. Now, at that point, where were your injuries  
17 after Lieutenant Mitchell's alleged assault?

18 A. My genitals, my neck, my face, my chest, my  
19 back, my eye.

20 Q. Your neck and back were hurting at that point?

21 A. Yeah. Mostly my neck, yeah. Most of the pain  
22 was my neck and my genitals. But the genital  
23 pain really -- man, it was -- it was

1                   something -- I could never describe it.

2 Q. Okay. What caused your neck pain?

3 A. You know, I've talked to doctors and  
4                   therapists about that, but it could have been  
5                   anything, like the injury to C1. When I'm  
6                   trying to get my head away from him as he's  
7                   throwing punches, and, you know, I'm moving  
8                   around, and he's hitting me and -- this is  
9                   what they tell me -- that it caused trauma to  
10                  my neck, like, when your head snaps so hard,  
11                  that you just go really quick, you know,  
12                  that's damage to your neck. So I think that's  
13                  how I got my neck hurt.

14                  But again, he also -- I don't think this  
15                  is what it is, but I got punched on the side  
16                  of my neck when he missed my face. He punched  
17                  my face, my neck, my chest. All over the  
18                  place.

19 Q. Okay. Was there any direct blow to your  
20                  neck?

21                  **MS. FREEMAN:** Object to the form.

22                  **BY MR. MACKEY:**

23 Q. You can go ahead and answer, Mr. Raymond.

1 Q. And Nurse Hoppins comes in and -- I don't know  
2 the exact words you said.

3 A. No, I wasn't standing up when Ms. Hoppins came  
4 in.

5 Q. Okay. Were you still laying down?

6 A. I was still laying down on the bed.

7 Q. Okay. And then --

8 A. And then she came in with her clipboard. And  
9 there's a piece of paper on the clipboard that  
10 says inmate reported injuries or something  
11 like that.

12 Q. Okay. And what happens next?

13 A. She asked me if I had any injuries to report,  
14 as she's looking at me bleeding out of all  
15 these surfaces on my body. And I just -- I  
16 asked her for help. I said, please help me.  
17 And she said, what injuries do you have to  
18 report? I told her my penis really hurt, my  
19 testicles hurt, my neck hurts. She wrote  
20 something down on the clipboard and said, get  
21 this piece of shit the fuck out of here.

22 Q. Okay. And then what happens?

23 A. That's when I was grabbed, stood up and they

1           actually -- Lieutenant Mitchell left. He took  
2 off out of the room. Then it was me, Harte,  
3 Thomas, Giancola, Phillips. That guy, I  
4 really don't know his name. And then the  
5 two -- there was two COs. I don't know if  
6 they were in the room, but they kept walking  
7 back and forth from the emergency treatment  
8 room to the desk that's right outside the  
9 door.

10           And they were like, listen -- Thomas came  
11 up to me and said, listen, are you okay? I  
12 said, man, I'm really not okay. And he said,  
13 well, I got to take these chains off you. Are  
14 you going to freak out? I said, man, I don't  
15 have it in me. I need help. He said, well, I  
16 got nothing to do with that.

17           And he takes the chains off, they take the  
18 cuffs, they transfer it to around my back, and  
19 they take the shackles off, and we started  
20 walking. And that's when I realized that I  
21 was having a hard time walking. They took me  
22 to the box.

23           And then I was in -- the sergeant in the

1           box refused to take the pictures of me. They  
2           cleaned me up. Bunch of pictures were taken.  
3           They put all new -- they took pictures of my  
4           body. They put new -- brand new State green,  
5           brand new white t-shirt, brand new everything  
6           on me. Then they cleaned off my face again  
7           with baby wipes, and then they took another  
8           picture of me, and then they walked me to my  
9           cell.

10          Q. Okay. Let me stop you there. Were you still  
11           in the emergency treatment room when the --

12           **MS. FREEMAN:** Matt, please let  
13           Mr. Raymond finish his answer. Matt, if you  
14           had more to say, go ahead.

15           **MR. MACKEY:** He appeared to be done.

16           **MS. FREEMAN:** I'm sorry. Mr. Mackey,  
17           you said I'm going to stop you there. So I  
18           just want to make sure, Matt, that you said  
19           everything.

20           **THE WITNESS:** I'm good, Emma. I'm okay.

21           **BY MR. MACKEY:**

22          Q. So were you in the emergency treatment room  
23           when the shackles were taken off?

1 A. Yes.

2 Q. Okay. And you were standing up at that point?

3 A. Yes.

4 Q. Okay. And then you were handcuffed -- your  
5 hands were put behind you with handcuffs?

6 A. Yes, sir.

7 Q. Okay. So at that point, is that the only  
8 restraint on you, the handcuffs behind your  
9 back?

10 A. Yes, sir.

11 Q. Okay. And there's nothing restricting you  
12 from walking at that point? There's no chains  
13 or anything like that?

14 A. Correct, sir. They took those off as well.

15 Q. Okay. And --

16 A. They had me walk through the facility in  
17 transportation chains. It's DOCCS policy.  
18 You have to take them off as soon as you're in  
19 a secure area.

20 Q. Okay. Who -- let me back up. At that point  
21 you said you realized, when you started  
22 walking, you had difficulty walking, right?

23 A. Yeah. It wasn't -- it didn't, like, jump out

1 at me. It just -- I noticed, like, I  
2 couldn't -- my right leg, it just didn't -- it  
3 didn't want to go, and then I couldn't make it  
4 up the stairs. I couldn't walk up the stairs.  
5 And Tom was like, yo, what the fuck is going  
6 on with you? I said, I don't know, man. He's  
7 like, all right, we're going to take the  
8 elevator, because I couldn't carry your big  
9 ass up the stairs. We get in the elevator.  
10 There was no incident. And then -- yeah, like  
11 I said.

12 Q. Okay. When you say pain walking, was it -- or  
13 difficulty walking, were you able to stand up  
14 straight? Were you hunched over or were  
15 you --

16 A. Standing up straight. And I'm not -- it  
17 didn't -- I don't know how to explain it, but  
18 it didn't hurt. It didn't hurt. I just could  
19 not -- I couldn't, like, take a full step. It  
20 was -- and it was like that for years. I have  
21 to install a chair lift at my house because I  
22 can't walk up and down stairs.

23 Q. So was it just a difficulty of putting one

1 foot in front of the other?

2 **MS. FREEMAN:** Object to the form.

3 **THE WITNESS:** No. No. I have trouble  
4 walking.

5 **BY MR. MACKEY:**

6 Q. Okay. Do you still have trouble walking?

7 A. Periodically, yes.

8 Q. Okay. And you mentioned your right leg. You  
9 had trouble walking with your right leg. Is  
10 it still the same now, is it trouble on your  
11 right side?

12 A. Yes.

13 Q. Okay. And what diagnosis have you been  
14 provided by the doctors related to that?

15 A. They said that -- you know, he said it's  
16 probably from the trauma I sustained to my  
17 neck. But there's no official diagnosis. You  
18 know, it's just my doctor says I took a lot of  
19 trauma, you know, and my body is presenting  
20 those symptoms from -- as the result of the  
21 trauma that I sustained.

22 Q. Has it been referred to as nerve damage,  
23 anything like that?

1 A. Yes. Yes. I'm actually on medication for  
2 nerve damage. What's that?

3 Q. What medication?

4 A. Neurontin.

5 Q. I'm sorry. What was it again?

6 A. Neurontin.

7 Q. Neurontin.

8 A. I've had the nerve damage tests. All came  
9 back conclusive.

10 Q. Now, on a scale of one to ten, how bad was  
11 your pain right after the alleged assault?

12 A. It was really high at first, after he hit me  
13 the third time in the genitals. And then it  
14 kind of went down a little bit. So it started  
15 at, like, a nine, ten, and then it went to,  
16 like, a four.

17 And then, you know, as I walked, it got  
18 worse. But when I got sitting still, it went  
19 back down. And then eventually it just  
20 escalated. It got worse and worse and worse.  
21 Later on, I also ended up finding out that was  
22 because of my prostate expanding from the  
23 trauma.

1 Q. Okay. Now, you're taken out of the emergency  
2 treatment room and you're brought to SHU,  
3 correct?

4 A. Correct.

5 Q. Who escorted you from the emergency treatment  
6 room to SHU?

7 A. So it was me, Thomas, Harte, and this -- I  
8 don't know this other guy's name. I just  
9 don't know. I've never seen him before. I  
10 don't know his name.

11 Q. And did you go straight to SHU or did you go  
12 anywhere else before you went to SHU?

13 A. I went straight to SHU. They tried to walk me  
14 up the stairs. I couldn't walk up the stairs,  
15 so we did the elevator.

16 Q. Okay. Did anything beyond the norm happen  
17 while you were escorted from the emergency  
18 treatment room to SHU?

19 A. Not the first time. The second time I got  
20 escorted is when things went beyond the norm.

21 Q. Okay. Well, we'll get to that. So you're  
22 escorted to SHU, and then you're put in a  
23 cell?

1 A. No. They took all the clothes -- the bloody  
2 clothes off of me, they cleaned me up, took  
3 pictures, put brand new clothes on me, took  
4 pictures again, made me sign a piece of paper.

5 And then -- oh, while I got up there, they  
6 said to me, we have absolutely nothing to do  
7 with what those guys did to you, so please do  
8 not act out up here, because we didn't do that  
9 to you, and we would have never done that to  
10 you. And then I got escorted to my cell.

11 Q. Who made those comments to you?

12 A. The sergeant. Very heavy set, blonde hair.

13 He's the one that said that to me.

14 Q. Okay. But not Sergeant Harte?

15 A. No. Harte left. Harte left as soon as the  
16 institutional cameras picked me up. Because  
17 his job was to video record me that entire  
18 time. And then once -- because the SHU has a  
19 lot of cameras in there. Once you walk in the  
20 SHU, the sergeant is no longer needed to  
21 videotape you, because you're already on film  
22 once you walk in there.

23 Q. Okay. So you're cleaned up, you're given new

1           clothes and then you're put into a cell at  
2           SHU?

3       A. Yeah. I'm cleaned up, they take pictures, new  
4           clothes, more pictures, they put me in the  
5           cell. But on the walk down to the cell,  
6           everybody saw me and basically were screaming.  
7           It was a mad house. Everybody was like, look  
8           what you did to him. My eye had started  
9           bleeding again. My face was bleeding.

10           So the other inmates started to go crazy.  
11           I get in my cell. I tell them I need help, I  
12           need help. And they're like, we can't do  
13           anything, there's nothing we can do to help  
14           you. So one of the guys on my -- in my tank  
15           said to me -- said, hey, Matt, you need to go  
16           to MHU. So I fashioned a noose, and told them  
17           I was going to commit suicide and put it  
18           around my neck.

19       Q. And this is while you're in your cell in SHU?

20       A. Correct.

21       Q. Did you have intent of committing suicide or  
22           you just did this to get the --

23       A. I did it to get treatment. And that's when I

1 Q. Well, let's look at the second photo. Is that  
2 what you're referring to as your eye being  
3 swollen shut?

4 A. Yeah.

5 Q. And I just want to clarify. These photos were  
6 taken once you got to SHU?

7 A. Yeah. But you can't -- yeah, these were the  
8 ones that they took after -- I don't know if  
9 you're seeing something different, but I  
10 can't -- in my copy, it's all grainy. I can't  
11 really see anything. Like, I can kind of see  
12 the handprints around my throat. My throat.

13 **MS. FREEMAN:** If you're going to ask  
14 more questions about these photographs, I  
15 think sometimes the reproductions aren't  
16 great, so maybe you can zoom in on the screen  
17 on the photo you want to question about.

18 **BY MR. MACKEY:**

19 Q. I can do that. This photo here, the one I  
20 have on the screen. Mr. Raymond, are you  
21 looking at the hardcopies or the screen?

22 A. Now I'm looking at the screen.

23 Q. Okay. This is the photo, you say, shows the

1 Q. So let me pull up the complaint that you  
2 filed. If you look -- this is Exhibit 1,  
3 which is the complaint or the amended  
4 complaint. Mr. Raymond, if you look at  
5 paragraph 92, do you see that on the screen?  
6 Mr. Raymond?

7 A. Yes. I was just reading it, sir.

8 Q. Okay.

9 A. Yeah, I see it.

10 Q. All right. So according to paragraph 92, it  
11 says: For weeks after the assault,  
12 Mr. Raymond remained in physical agony and  
13 repeatedly filed sick call request forms  
14 regarding blood in his urine, pain upon  
15 urination and pain in his lower abdomen,  
16 groin, lower back and sides.

17 Do you see that?

18 A. Yes, sir.

19 Q. Okay. When you say you remained in physical  
20 agony, were you in pain? How long were you in  
21 pain after September 14th, 2016?

22 **MS. FREEMAN:** Object to the form.

23 **THE WITNESS:** I've been in pain since

1                   then.

2                   **BY MR. MACKEY:**

3       Q. Okay. And you reported that every day you  
4                   went to the doctor you would inform them that  
5                   you had pain?

6                   **MS. FREEMAN:** Objection.

7                   **THE WITNESS:** Yes.

8                   **BY MR. MACKEY:**

9       Q. Okay. And the second sentence says: At all  
10                  times he was denied necessary medical care or  
11                  given insufficient and/or incomplete care.

12                  Were you -- you're claiming that you were  
13                  denied care by Nurse Hoppins?

14       A. Yes.

15       Q. Okay. And then there's -- you've also sued  
16                  Dr. Deborah Geer in this case. Are you  
17                  claiming that Dr. Geer refused to provide you  
18                  medical care or sufficient medical care?

19       A. Yes.

20       Q. Okay. How many times did you meet with  
21                  Dr. Geer?

22                   **MS. FREEMAN:** I'm sorry. Pat, I didn't  
23                  hear that question.